

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

Emoji Company GmbH

Plaintiff,

v.

The Individuals, Corporations, Limited  
Liability Companies, Partnerships, and  
Unincorporated Associations Identified on  
Schedule A Hereto

Defendants.

Case No.: 1: 23-cv-01112

Judge John F. Kness

Magistrate Judge Young B. Kim

**DEFENDANT XIAMEN HAILUN TRADING CO., LTD.'S MOTION TO DISMISS**

Defendant Xiamen Hailun Trading Co., Ltd., upon the accompanying Memorandum of Law and the accompanying Declaration of Kunhuo Gong, by and through the undersigned counsel, respectfully moves to dismiss this lawsuit for lack of personal jurisdiction under Federal Rule of Civil Procedure 12(b)(2).

Date: July 21, 2023,

Respectfully submitted,

By: /s/ Zhen Pan  
One of Its Attorneys

Zhen Pan  
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*Counsel for Defendant Xiamen Hailun  
Trading Co., Ltd.*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on July 21, 2023, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF and served it on all counsel of record.

By: /s/ Zhen Pan  
Zhen Pan